

REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 27, 2007. Through this response, no claims have been amended. Applicants have presented arguments below in view of the new interpretation of the primary reference set forth in the final Office Action. Reconsideration and allowance of the application and pending claims 1-20 are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(e)

A. Statement of the Rejection

Claims 1-4, 6, and 9-19 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by *Takahashi et al.* ("*Takahashi*," U.S. Pat. No. 2004/0004671). Applicants respectfully traverse this rejection.

B. Discussion of the Rejection

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claims is represented in the *Takahashi* reference. Applicants discuss the *Takahashi* reference and Applicants' claims in the following.

Independent Claim 1

Claim 1 recites (with emphasis added):

1. A system which docks a camera, comprising:
a base; and
a platform configured to dock with the camera and configured to couple to the base such that the platform may be rotated relative to the base and about an axis of rotation.

Applicants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. The Office Action refers to Figure 13 of *Takahashi* and appears to equate the base with reference 602 and the platform with reference 604 (see page 2 of the Office Action). Applicants respectfully disagree that this new interpretation presented by the final Office Action anticipates or suggests the language of the claim. From Figure 13 of *Takahashi*, it is clear that the element 604 is not coupled to element 602. Instead, element 604 appears to be coupled to element 702. Further, *Takahashi* provides the following description with regard to the structure shown in Figure 13 on page 7, paragraph [0012] (emphasis added):

The cradle 700 shown in FIG. 13 has a rotation system in a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. As shown in FIG. 13, the camera mounting unit 604 is mounted rotatably on the leg portion 602 with a rotation axis 703 placed in the center parallel to the vertical direction of the cradle 700. The user can easily rotate the camera mounting unit 604 by hand. In the case of the cradle 700 having the above-mentioned rotation system, it is preferable that the power input terminal 610 and the digital communications terminal 612 are mounted on the leg portion 602.

Applicants respectfully submit that this recited section of *Takahashi* and Figure 13 make it clear that *Takahashi* fails to disclose, teach, or suggest at least the above-emphasized claim limitations. Indeed, the description of *Takahashi* above might suggest to one having ordinary skill in the art that the elements 602, 604, and 702 provide an effect that is opposite

to the alleged coupling between 602 and 604. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Because independent claim 1 is allowable over *Takahashi*, dependent claims 2-4, 6, and 9-10 are allowable as a matter of law for at least the reason that the dependent claims 2-4, 6, and 9-10 contain all elements of their respective base claim. See, e.g., *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

Independent Claim 11

Claim 11 recites (with emphasis added):

11. A method for docking a camera, the method comprising the steps of:
- coupling the camera to a docking station platform; and
 - rotating the camera relative to the base and about an axis of rotation, ***the rotation permitted by the docking station platform configured to couple to a docking station base*** such that the docking station platform may be rotated about the axis of rotation.

For similar reasons presented above in association with claim 1, Applicants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Because independent claim 11 is allowable over *Takahashi*, dependent claims 12-14 are allowable as a matter of law.

Independent Claim 15

Claim 15 recites (with emphasis added):

15. A system for docking a camera, comprising:
- means for physically coupling the camera to a docking station platform;
 - means for communicatively coupling the camera to a docking station platform; and
 - means for rotating the camera relative to a docking station base and about an axis of rotation, the rotation permitted by the docking station platform configured to couple to the docking station base*** such that the docking station platform may be rotated about the axis of rotation.

For similar reasons presented above in association with claim 1, Applicants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Because independent claim 15 is allowable over *Takahashi*, dependent claims 16-19 are allowable as a matter of law.

Due to the shortcomings of the *Takahashi* reference described in the foregoing, Applicants respectfully assert that *Takahashi* does not anticipate Applicants' claims. Therefore, Applicants respectfully request that the rejection of these claims be withdrawn.

II. Claim Rejections - 35 U.S.C. § 103(a)

A. Rejection of Claims

Claim 5 has been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Omps* (U.S. Patent No. 7,163,181). Claims 7, 8 and 20 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Rudduck et al.* ("*Rudduck*," U.S. Pat. Pub. No. 2003/0075603). Applicants respectfully traverse these rejections.

B. Discussion of the Rejection

The U.S. Patent and Trademark Office ("USPTO") has the burden under section 103 to establish a *prima facie* case of obviousness according to the factual inquiries expressed in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). The four factual inquiries, also expressed in MPEP 2100-116, are as follows:

- (A) Determining the scope and contents of the prior art;
- (B) Ascertaining the differences between the prior art and the claims in issue;
- (C) Resolving the level of ordinary skill in the pertinent art; and

(D) Evaluating evidence of secondary considerations.

Applicants respectfully submit that a *prima facie* case of obviousness is not established using the art of record.

Claim 5

As set forth above, Applicants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized features of claim 1. Further, Applicants respectfully submit that *Omps* fails to remedy these deficiencies. Accordingly, for at least the reasons that claim 5 incorporates the allowable claim features of independent claim 1, Applicants respectfully submit that claim 5 is allowable as a matter of law, and hence respectfully request that the rejection be withdrawn.

Claims 7, 8, and 20

As set forth above, Applicants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized features of claims 1 and 15. Further, Applicants respectfully submit that *Rudduck* fails to remedy these deficiencies. Accordingly, for at least the reasons that claims 7, 8, and 20 incorporate allowable claim features of their respective base claim, Applicants respectfully submit that claims 7, 8, and 20 are allowable as a matter of law, and hence respectfully request that the rejection be withdrawn.

CONCLUSION

Applicants respectfully submit that Applicants' pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, and similarly interpreted statements, should not be considered well known since the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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